# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

In re: Equifax, Inc. Customer Data Security Breach Litigation MDL Docket No. 2800 No. 1:17-md-2800-TWT

This document relates to:

City of Chicago v. Equifax Inc., No. 1:18-cv-1470

### **JOINT MOTION TO EXTEND DEADLINES**

Pursuant to Federal Rule of Civil Procedure 6(b) and Section 3 of Case Management Order No. 5 ("CMO-5," Dkt. 409), Plaintiff City of Chicago ("Chicago") and Defendant Equifax Inc. ("Equifax") respectfully request that the Court extend all deadlines with respect to Chicago's filing of an amended complaint and briefing on Equifax's motion to dismiss the amended complaint by twenty-eight (28) days. In support of the instant motion, the parties state as follows:

1. On January 23, 2020, the Court granted the parties' Joint Motion to Set Deadlines, setting the following schedule: Chicago's deadline to file an amended complaint as February 19, 2020; Equifax's deadline to file a motion to dismiss the amended complaint as March 20, 2020; Chicago's deadline to respond to the motion to dismiss as April 10, 2020; and Equifax's deadline to reply in support of its motion to dismiss as April 24, 2020. (*See* MDL Dkt. 968.)

- 2. The parties have since reached an agreement in principle to settle this lawsuit and are currently in the process of finalizing a formal settlement agreement.
- 3. Accordingly, the parties jointly request a twenty-eight (28) day extension of all deadlines set forth in the Court's January 23rd Order (MDL Dkt. 968), during which they intend to finalize this case's resolution.

WHEREFORE, the parties respectfully request that the Court enter an order setting forth the jointly proposed schedule outlined above. A proposed order is attached for the Court's consideration.

Respectfully submitted,

#### CITY OF CHICAGO,

Dated: February 18, 2020

/s/ Eve-Lynn J. Rapp
One of Plaintiff's Attorneys

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# **CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 5.1(B)**

Pursuant to Local Rule 7.1(D), I hereby certify that that above and foregoing

Joint Motion to Extend Deadlines complies with Local Rule 5.1(B) and has been prepared using 14-point Times New Roman font.

/s/ Eve-Lynn J. Rapp

## **CERTIFICATE OF SERVICE**

I certify that on February 18, 2020, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of Georgia using the Court's CM/ECF system, which will automatically send notification of this filing to all counsel of record.

/s/ Eve-Lynn J. Rapp